

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

JASON IBARRA,

Plaintiff,

Civil No.: 22-cv-14067-WM

vs.

FUTURE MOTION, INC., a Delaware Corporation,

Defendant.

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**CORRECTED JOINT STIPULATION OF DISMISSAL WITH PREJUDICE**

Pursuant to Rule 41 (a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff, Jason Ibarra, and Defendant, Future Motion, Inc., hereby stipulate to the dismissal of this civil action, with prejudice. Each party shall bear their own costs and fees, including attorneys' fees, incurred in connection with this action.

The parties further agree that this Stipulation of Dismissal With Prejudice is contingent upon the Court retaining jurisdiction to enforce the terms of the settlement agreement, and respectfully move the Court enter an Order of Dismissal which expressly provides that this Court retains jurisdiction to enforce the terms of the settlement agreement pursuant to *Anago Franchising, Inc. v. Shaz, LLC*, 677 F.3d 1272 (11th Cir. 2012).

Dated: May 3, 2023

Respectfully submitted,

/s/ Lowell P. McKelvey

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*Attorneys for Defendant Future Motion, Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing was served by electronically filing with the Clerk of the Court using CM/ECF on May 3, 2023 on counsel or parties of record on the Service List below.

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